

In the United States District Court for the Southern District of
Mississippi



Dorothy Lee

Morris Lee

Cause

v.

Civil Action 1:13-cv-441-HSO-RHW

Jackson County, MS

Mike Bird etc

MOTION TO REOPEN CASE

Comes now, The Lee Family, here by re-files this lawsuit on the ground, newly discovered evidence. John Lee, Jr. died in the Jackson County Jail around February 24, 2013. The cause of his death was epilepsy, due to neglect in getting his medication.

Facts

John Lee, Jr had been requesting his medication, for nearly a month, to the Jackson County Jail officials. None of the officials complied with Mr. Lee's request, and due to this fact, Mr. Lee had epilepsy seizures and died.


New Evidence

The Lee Family was able to contact officers, who are willing to testify, in John Lee's case. Also, there is video showing that Mr. Lee requested for his medication in many occasions. It was denied, which is a violation of his constitutional rights to the 8th and 14th amendment to the US Constitution.

The Lee Family is asking for \$226 million to prevent from happening to someone else, and their pain and suffering for their loss. The Lee Family hope that this instant motion be granted.

Date: 03-28-2017

Respectfully,

A handwritten signature in blue ink, appearing to read "Dorothy Lee", is written over a horizontal line.

PO Box 571

Nesbit, MS 38651

CERTIFICATE OF SERVICE

I, DOROTHY LEE, do hereby certify, that I have this day filed the foregoing with the Clerk of Court, and sent a copy of such filing by regular mail to the following:

Douglas L. Tynes, Jr.
TYNES LAW FIRM, PA
P. O. Box 966
Pascagoula, MS 39568

W. Harvey Barton
BARTON LAW FIRM, PLLC
3007 Magnolia Street
Pascagoula, MS 39567

Barry C. Campbell
THE MITCHELL FIRM, PLLC
1020 Highland Colony Parkway, Suite 704
Ridgeland, MS 39157

James L. Farragut, III
FARRAGUT LAW FIRM, PLLC - Gulfport
3423 Washington Ave.
Gulfport, MS 39501

Glen K. Till, Jr.
SIMMONS LAW GROUP, PA
240 Trace Colony Park Drive
Suite 200
Ridgeland, MS 39157

This the 28 day of MARCH, 2017

By:

DOROTHY LEE